

December 30, 2016

Mike Meadows
Director Construction Management
Puyallup School District, No. 3
302 2nd Street SE
Puyallup, WA 98372

Re: Firgrove Elementary FEMA Habitat Assessment Summary

The Watershed Company Reference Number: 160932

Dear Mike:

In 2008, the National Marine Fisheries Service (NMFS) issued a Biological Opinion, which found that the implementation of the National Flood Insurance Program (NFIP) in the Puget Sound region jeopardizes the continued existence of federally threatened salmonids and southern resident killer whales. As a result, NMFS established Reasonable and Prudent Alternatives to ensure that development within the Special Flood Hazard Area (100-year floodplain), floodway, Channel Migration Zone (CMZ), and riparian buffer zone do not adversely affect water quality, flood volumes, flood velocities, spawning substrate, or floodplain refugia for listed salmonids. Because the NFIP is implemented by the Federal Emergency Management Administration (FEMA) through participation by local jurisdictions that adopt and enforce floodplain management ordinances, FEMA has delegated responsibility to the local jurisdictions to ensure that development does not adversely affect listed species. This letter documents compliance with these policies. The following attachments are included:

- Effective 1988 Flood Insurance Rate Map
- Pending 2017 Flood Insurance Rate Map
- Existing and Pending Flood Zones Aerial Photograph
- Proposed Site Plan

The proposed Firgrove Elementary redevelopment is located at 13918 Meridian Avenue E in Puyallup, Washington; Section 16, Township 19 North, Range 5 East of the Willamette Meridian; Clear/Clarks Creek Subbasin; Puyallup-White Watershed Resource Inventory Area (WRIA 10). The proposed redevelopment includes new

primary structures, parking areas, access drives, and associated ball fields and play areas.

FEMA is in the process of updating the Flood Insurance Rate Maps (FIRM) for the project area. The current effective maps depict two flood hazard areas on the subject property, one in the west/southwest portion of the property and one in the southeast corner of the property. Both areas are identified as Zone B, which is described by FEMA as *“area of moderate flood hazard, usually the area between the limits of the 100-year and 500-year floods. B Zones are also used to designate base floodplains of lesser hazards, such as areas protected by levees from 100-year flood, or shallow flooding areas with average depths of less than one foot or drainage areas less than 1 square mile.”* The pending revised FIRM, which will become effective March 7, 2017, depicts one Zone X area in the west/southwest portion of the property (in the same general location as the current Zone B area), but the Zone B area in the southeast corner has been removed. Zone X designations are the same description as Zone B.

Some of the proposed site improvements appear to be at least partially located within both existing Zone B areas and the pending Zone X area. Any grading, clearing, filling, or construction activities within a floodway, 100-year floodplain, riparian buffer area, or channel migration zone require preparation of a FEMA Habitat Assessment to ensure compliance with the Endangered Species Act (ESA). However, Zones B and X are outside of the 100-year floodplain or are within shallow flooding areas, such as wetlands, that do not have a primary association with streams, rivers, lakes, or shorelines. There are no streams/riparian areas located on the property, and there are no documented streams/riparian areas in the general vicinity that would be attributed to the flood hazard areas on the property. According to the National Wetlands Inventory (USFWS 2016), the Zone B/Zone X area on the west side of the property generally corresponds with a mapped palustrine scrub-shrub wetland. Riparian buffer zones, which are technically outside the jurisdiction of FEMA, are specific to streams, lakes, and shorelines, not wetlands, and CMZ are specific to streams and rivers. Since none of these features are present in the vicinity, it can be assumed that no riparian buffer area or channel migration zone are located on the subject property.

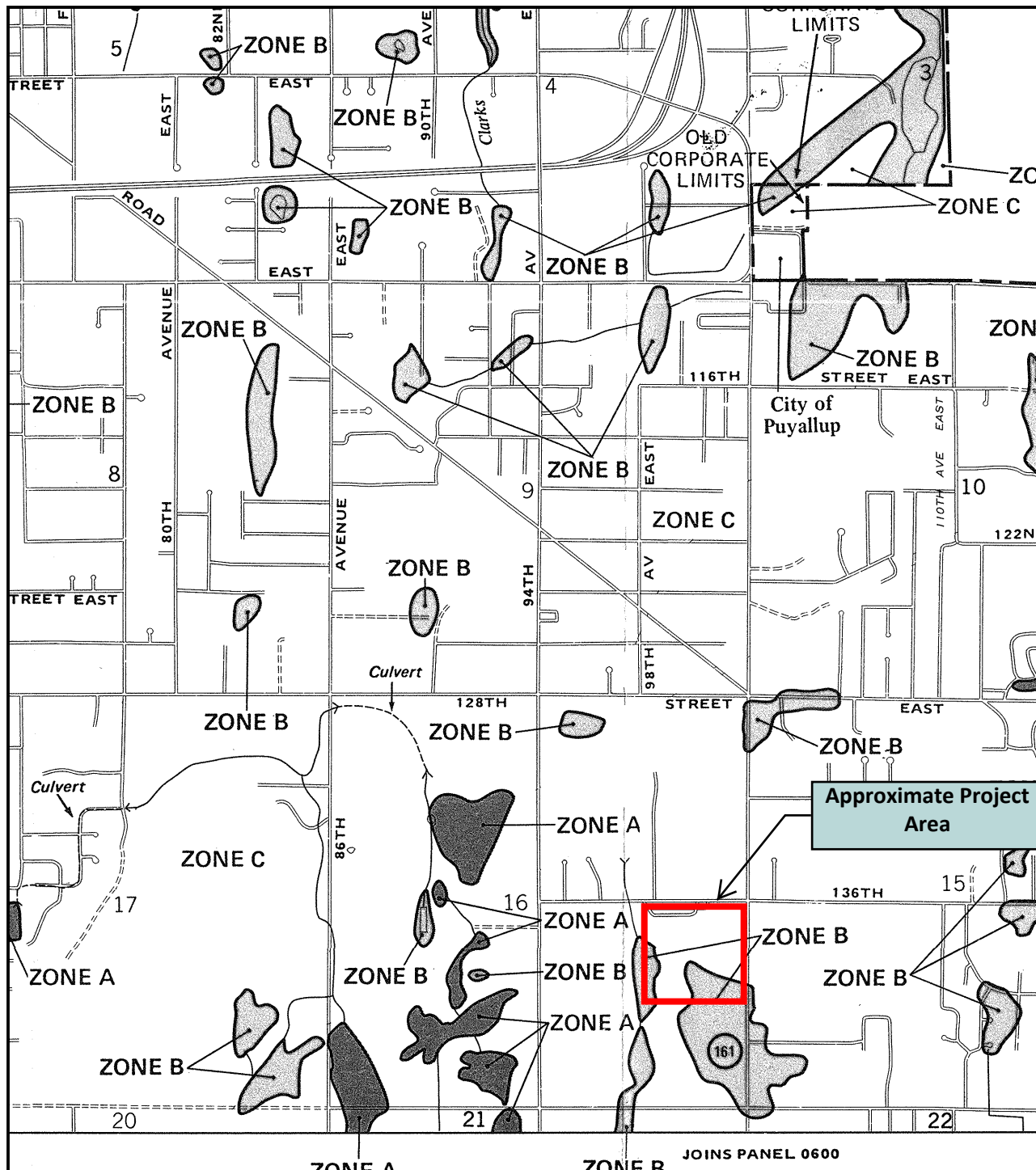
Given the lack of a documented 100-year floodplain, floodway, riparian buffer zone, or CMZ, a formal FEMA Habitat Assessment is not required. Furthermore, since no in-water work is proposed and there are no aquatic areas capable of supporting fish in the project vicinity, the proposed redevelopment of Firgrove Elementary School will have no effect on ESA-listed salmonid fish species.

Please call if you have any questions or if we can provide you with any additional information.

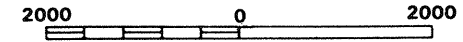
Sincerely,

A handwritten signature in blue ink, appearing to read "R. Kahlo". The signature is fluid and cursive, with the first name "Ryan" and last name "Kahlo" clearly distinguishable.

Ryan Kahlo, PWS
Ecologist



APPROXIMATE SCALE IN FEET



NATIONAL FLOOD INSURANCE PROGRAM

FIRM FLOOD INSURANCE RATE MAP

**PIERCE COUNTY,
WASHINGTON**
(UNINCORPORATED AREAS)

PANEL 350 OF 1375
(SEE MAP INDEX FOR PANELS NOT PRINTED)

COMMUNITY-PANEL NUMBER
530138 0350 D

**MAP REVISED:
AUGUST 4, 1988**



Federal Emergency Management Agency

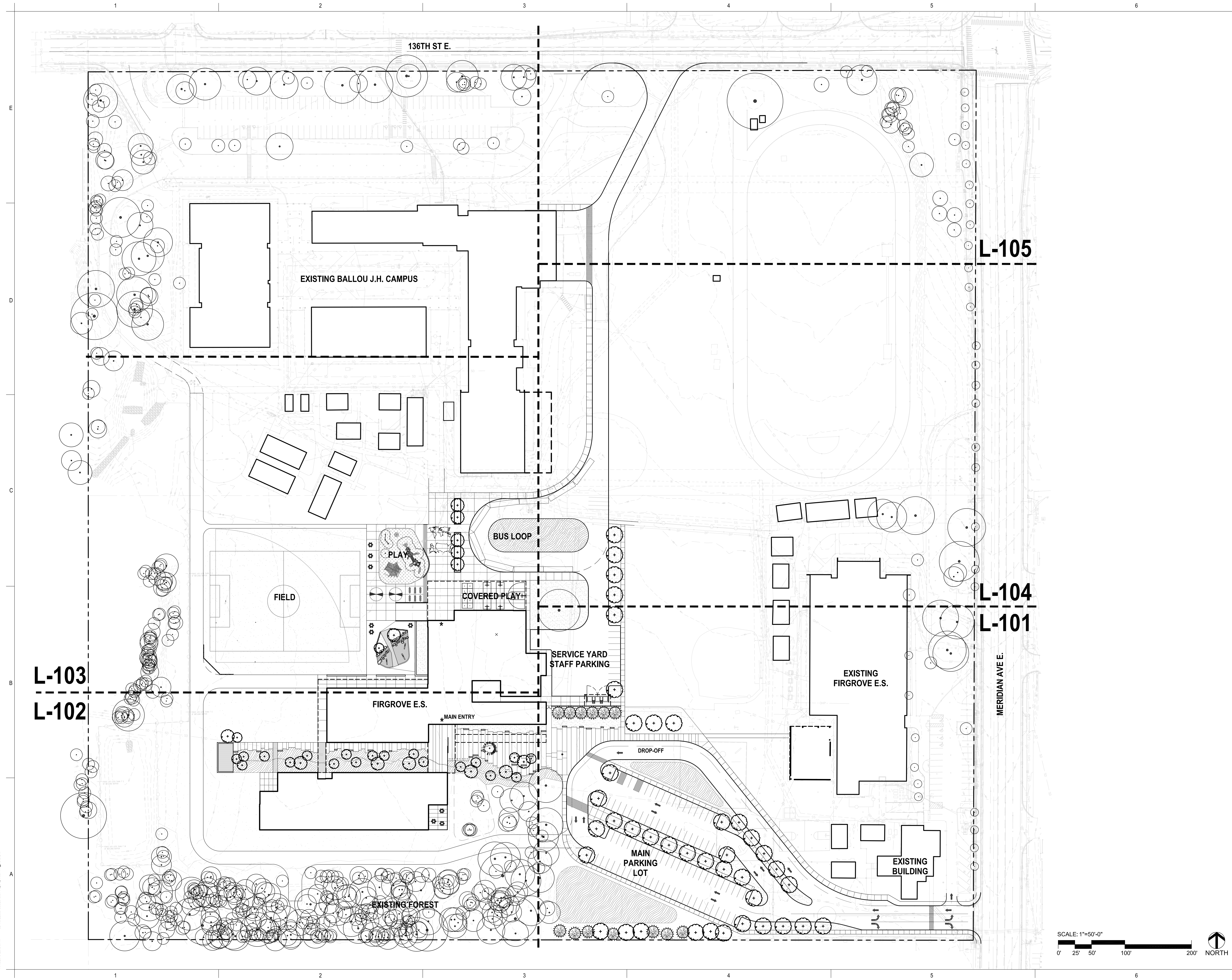
This is an official copy of a portion of the above referenced flood map. It was extracted using F-MIT On-Line. This map does not reflect changes or amendments which may have been made subsequent to the date on the title block. For the latest product information about National Flood Insurance Program flood maps check the FEMA Flood Map Store at www.msc.fema.gov



County Flood Data and
new 2014 FEMA maps (not
yet adopted by FEMS)

Current adopted FEMA
maps

Approximate Project
Area



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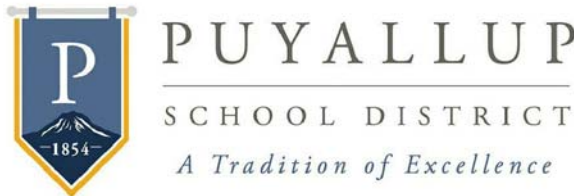
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(206) 441-0478 FAX

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PORTLAND OR 97209
(503) 224-4032 OFFICE
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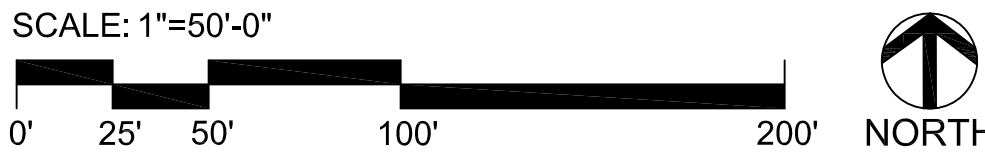
Firgrove Elementary
13918 Meridian Ave E,
Puyallup, WA 98373

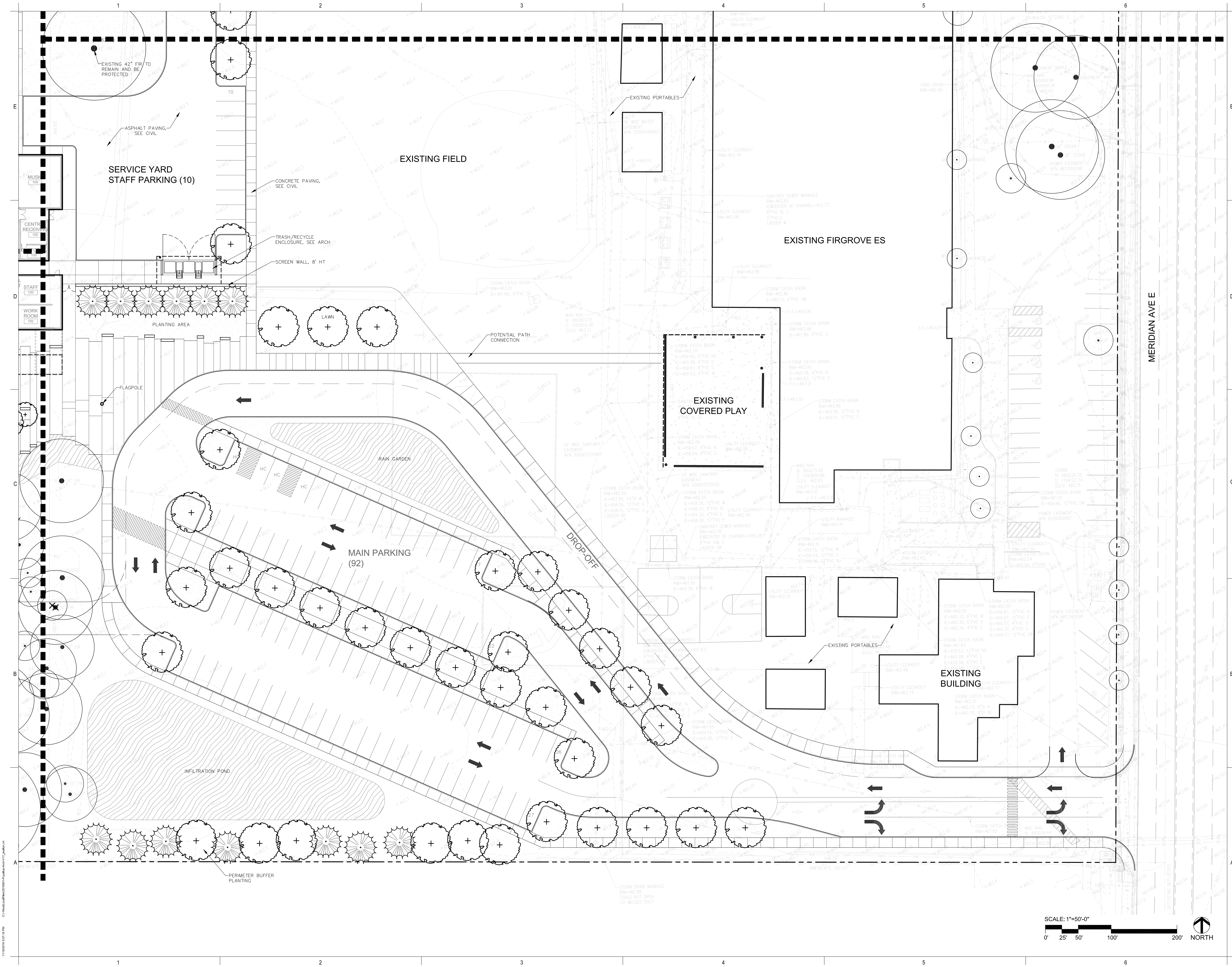
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ISSUE:	SCHEMATIC DESIGN	

PROJECT NO:	2016901.00
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OVERALL LANDSCAPE SITE PLAN

L-100





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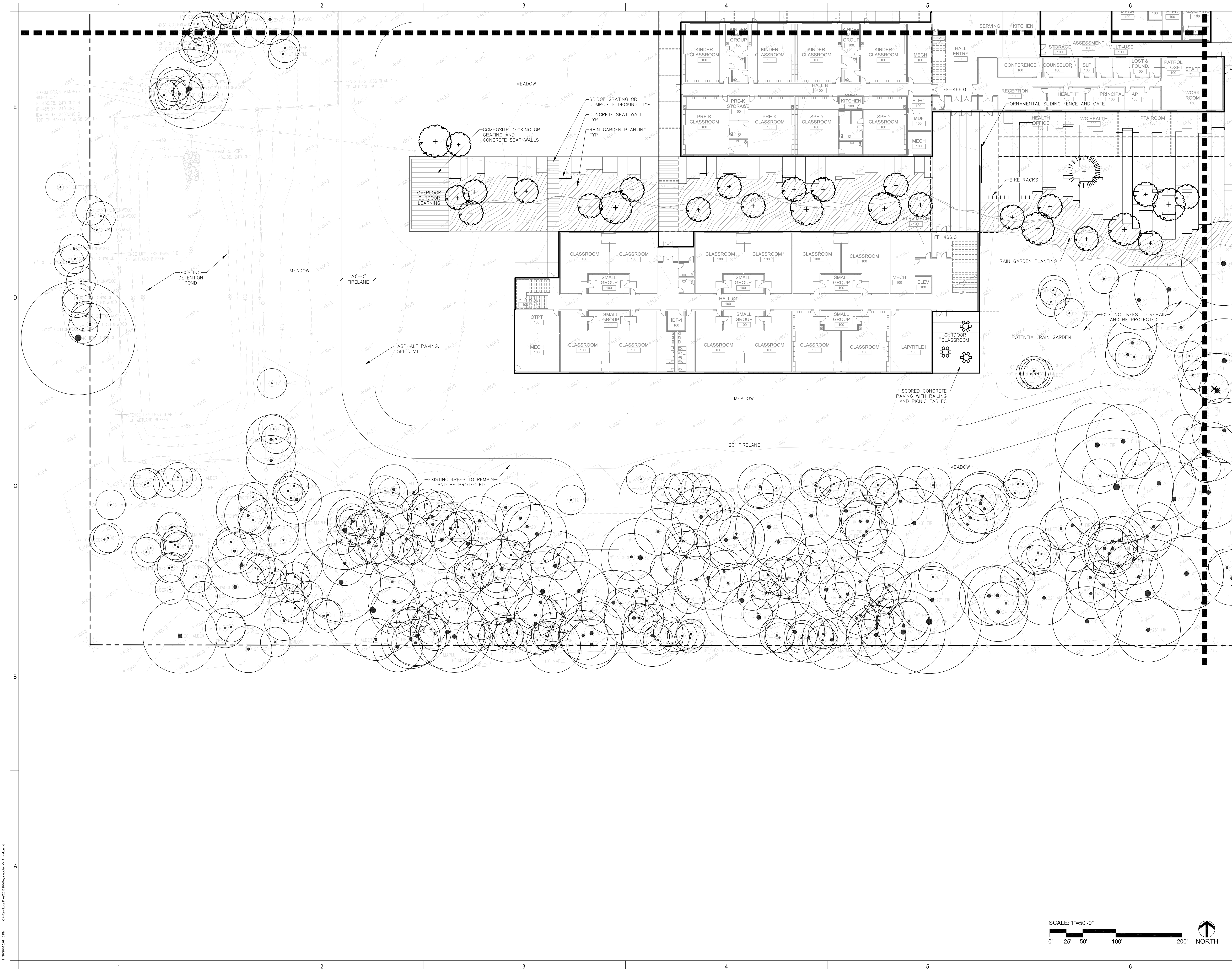
LANDSCAPE ARCHITECTURE 2923 1 MADISON ST SEATTLE WA 98112 206.322.1192 WWW.WDSHC.COM



Firgrove Elementary
13918 Meridian Ave E,
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LANDSCAPE SITE PLAN ENLARGEMENT		

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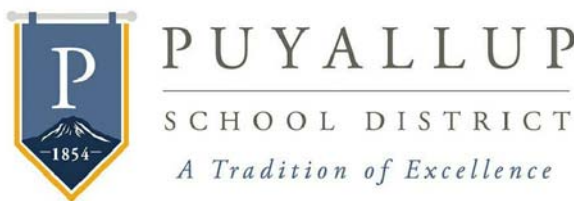
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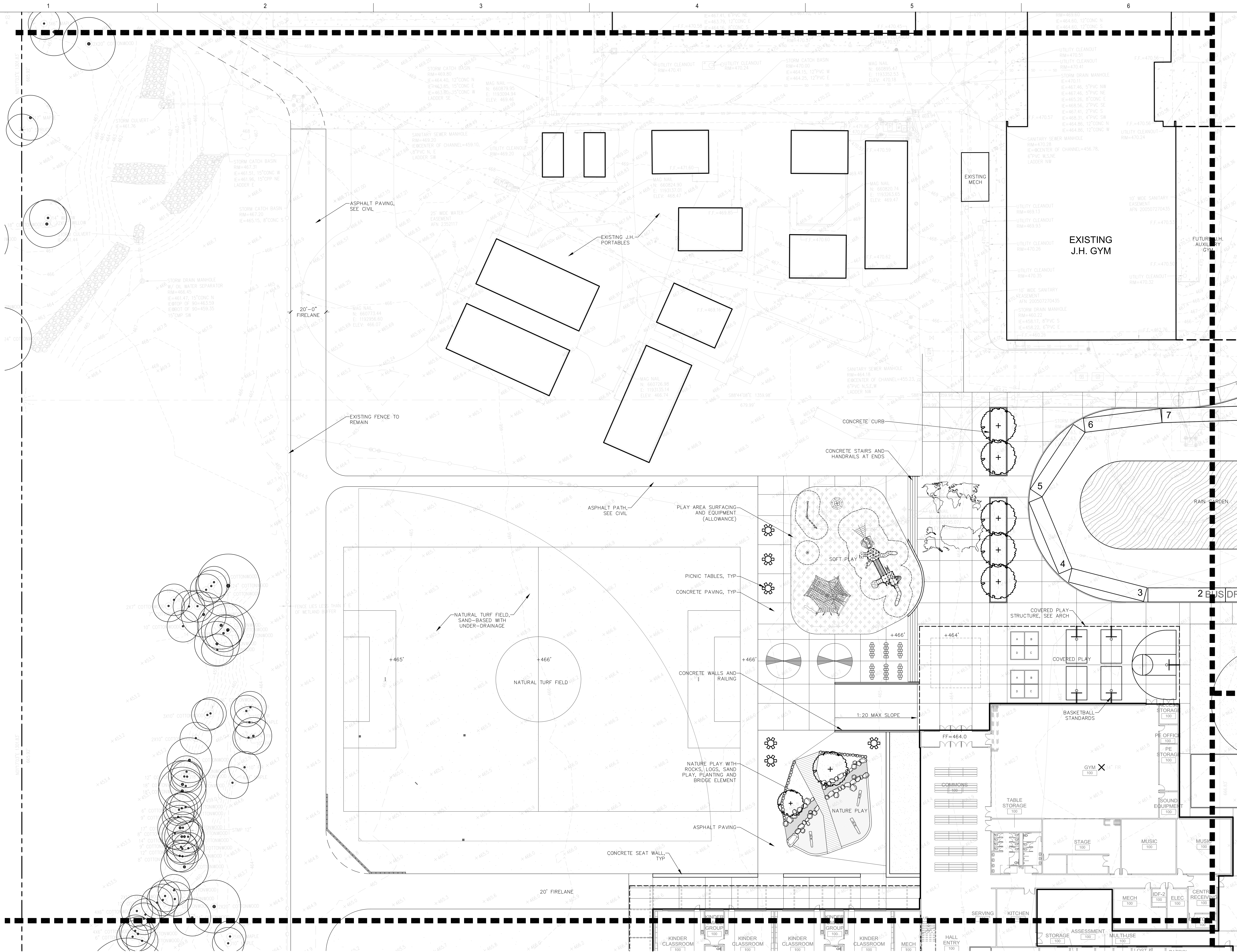
LANDSCAPE SITE PLAN
ENLARGEMENT

SCALE: 1"=50'-0"



L-102

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LANDSCAPE SITE PLAN ENLARGEMENT		



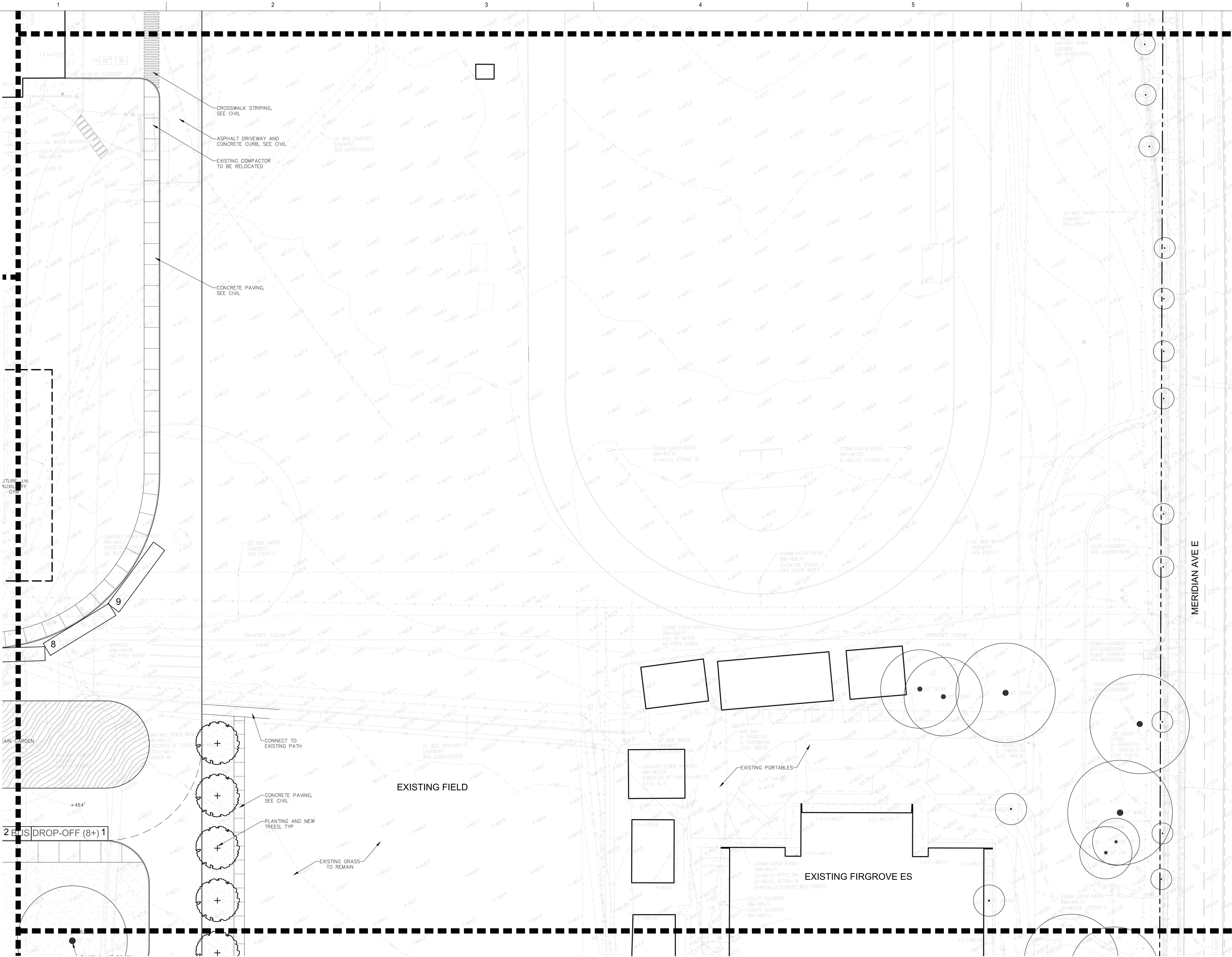
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0' 25' 50' 100' 200' NORTH

MARK	DATE	DESCRIPTION
ISSUE DATE:	2016 12 16	
ISSUE:	SCHEMATIC DESIGN	

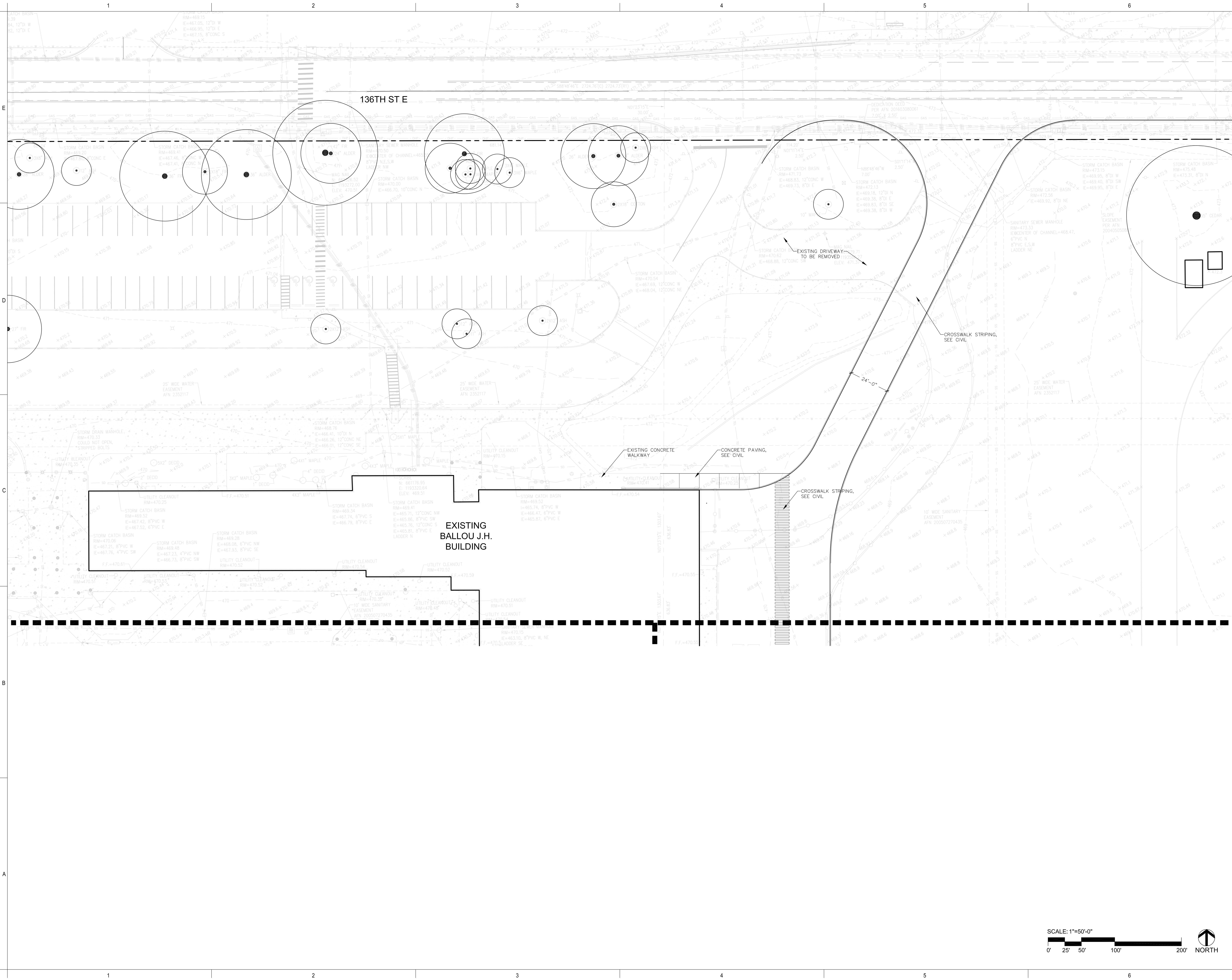
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LANDSCAPE SITE PLAN
ENLARGEMENT



SCALE: 1"=50'-0"

0' 25' 50' 100' 200' NORTH



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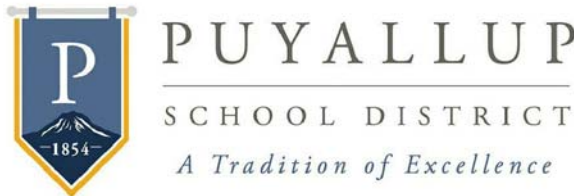
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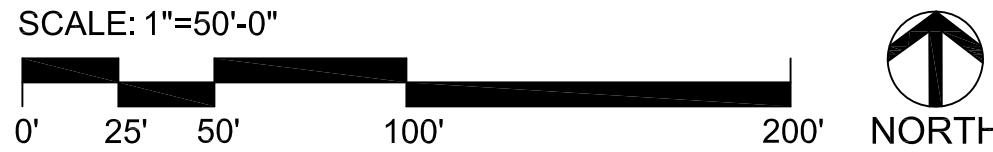


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ENLARGEMENT



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